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*Co-Lead Counsel for the Bout Class and Attorneys  
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[Additional Counsel Listed on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

**Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**No.: 2:15-cv-01045-RFB-BNW**

**PLAINTIFFS' RESPONSE TO  
ZUFFA, LLC'S MOTION  
REGARDING TRIAL CONFLICT**

1 Yesterday, Defendant Zuffa, LLC (“Defendant”) submitted a motion seeking, yet again,  
2 to postpone the long-awaited trial in this matter, based on a purported conflict with a case set for  
3 trial in the District of Delaware beginning April 5, 2024. This Court has already denied this  
4 request on several occasions, and should do so again, as the purported conflict is illusory and the  
5 Delaware trial will be far easier to reschedule than this one.  
6

7 On February 20, 2024, defense counsel’s law firm submitted a letter to the Honorable  
8 Richard G. Andrews, who is presiding over the Delaware case. That letter is attached hereto as  
9 Exhibit A. The letter notes that opposing counsel in the Delaware case *does not oppose a*  
10 *continuance of that trial*, and counsel in the Delaware case jointly propose two sets of alternative  
11 dates in July-August of this year that would work for both sets of counsel. Ex. A hereto, at 1.  
12 Moreover, trial in the Delaware case is expected to last “five to seven days.” *Id.* A five- to seven-  
13 day trial would, of course, be significantly easier to reschedule than the four-week trial  
14 anticipated in this matter. Finally, there is a motion for summary judgment pending in the  
15 Delaware case that could affect the timing of that trial or obviate the need for trial altogether. *Id.*<sup>1</sup>  
16

17 For these reasons, and for all the reasons for which this Court previously denied  
18 Defendant’s repeated requests to postpone the upcoming trial of this matter, Defendant’s motion  
19 should be denied.  
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26 <sup>1</sup> The trial date in the Delaware matter does not appear to be a firm date; trial in that matter is set  
27 to begin on April 5, 2024, “or as soon thereafter as convenient for the Court.” *See* Exhibit B,  
28 hereto.

1 Dated: February 21, 2024

Respectfully submitted,

2 /s/ Eric L. Cramer

3 Eric L. Cramer (*pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Plaintiffs' Response to Zuffa, LLC's Motion Regarding Trial Conflict was served on February 21, 2024, via the District Court of Nevada's ECF system to all counsel of record who have enrolled in this ECF system.

/s/ Eric L. Cramer

Eric L. Cramer